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*Attorneys for Plaintiff Salvador Martinez*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SALVADOR MARTINEZ, on behalf of  
himself and all others similarly situated,

Plaintiff,

vs.

LINKUS ENTERPRISES LLC; DOES 1  
through 50; inclusive,

Defendant(s).

Case No.: 2:21-cv-01119

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
DEFENDANT'S MOTION TO  
DISMISS (ECF No. 7)**

(First Request)

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO DEFENDANT'S  
MOTION TO DISMISS (ECF No. 7)**

Plaintiff Salvador Martinez ("Plaintiff") and Defendant LinkUs Enterprises LLC ("Defendant") by and through their respective counsel of record, hereby stipulate to the following extension of time for Plaintiff to respond to Defendant's Motion to Dismiss (ECF No. 7, the "Motion"). Plaintiff's response is currently due July 2, 2021. See ECF

1 No. 7.

2 Plaintiff has requested a two-week extension to July 16, 2021 to respond, and  
3 Defendant has agreed. Counsel has previously-planned family travel arrangements,  
4 some of which relate to the upcoming Independence Day holiday on July 4th. Further,  
5 counsel will continue to work together in good faith to explore the possibility of potential  
6 resolution.

7 Accordingly, Plaintiff and Defendant hereby agree that Plaintiff's response to the  
8 Motion shall be due on July 16, 2021. Defendant's Reply briefing shall be due on July  
9 23, 2021.

10 This is the first request for an extension of time to file a response to the Motion.  
11 This request is not sought for any improper purpose or other reason of delay.

12 Dated this 18th day of June 2021.

Dated this 18th day of June 2021.

13 Respectfully submitted,

Respectfully submitted,

14 /s/ Christian Gabroy

/s/ Daniel I. Aquino

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*Attorneys for Plaintiff*

*Attorneys for Defendant*

22 **IT IS SO ORDERED.**

23 June 21, 2021.

24 Date

25   
26 **RICHARD E. BOULWARE, II**  
27 **United States District Court**  
28